

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC PHARMACEUTICALS  
PRICING ANTITRUST LITIGATION**

**MDL 2724  
16-MD-2724**

**THIS DOCUMENT RELATES TO:**

**HON. CYNTHIA M. RUFÉ**

***ALL END-PAYER ACTIONS***

**STIPULATED PROTECTIVE ORDER**

This Stipulated Protective Order (“Protective Order”) is entered into by Plaintiffs BCBSLA and Motley Rice, as defined herein, and it is so ORDERED that:

1. This Protective Order pertains to any attorney associated with the law firm Motley Rice LLC (“Motley Rice”) and any other Motley Rice paralegals, legal assistants, library services employees, administrative assistants, employees, and contractors working in any capacity on the above-captioned case (“Motley Rice Generics Personnel”).
2. Other Motley Rice attorneys, paralegals, legal assistants, library services employees, administrative assistants, employees, and contractors are now or may in the future be working on matters where Louisiana Health Service & Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana (“BCBSLA”) is an adverse party (“Motley Rice Adverse Personnel”).
3. Motley Rice Generics Personnel shall not disclose, directly or indirectly, to any Motley Rice Adverse Personnel any confidential information that has been or may be

produced in discovery in this case that has been designated CONFIDENTIAL, HIGHLY CONFIDENTIAL, or OUTSIDE COUNSEL EYES ONLY.

4. Additionally, Motley Rice Generics Personnel shall not disclose to or share with any Motley Rice Adverse Personnel any attorney-client privileged materials or any attorney work product that reflect or contain confidential information pertaining to BCBSLA obtained in connection with this case.
5. Motley Rice Generics Personnel must refrain from participating in any decision adversely affecting BCBSLA.
6. Motley Rice Generics Personnel shall not be responsible for tasks that specifically apply to BCBSLA, including, but not limited to, questioning BCBSLA witnesses, or presenting BCBSLA documents or other evidence.
7. All Motley Rice personnel, including but not limited to Motley Rice Generics Personnel, shall be walled off from, and must not have access to, any information or material in this case that is protected by a privilege or protection belonging to BCBSLA. Motley Rice and other counsel for plaintiffs shall adopt procedures adequate to ensure such BCBSLA privileged or protected information or material is not given or disclosed to Motley Rice.
8. Motley Rice must notify this Court and BCBSLA's counsel immediately in the event it becomes aware this Protective Order has been breached.

**APPROVED AND SO ORDERED without objection this 20th day of September, 2021.**

**/s/ Cynthia M. Rufe**

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Cynthia M. Rufe, J.